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Secure by Design	Thank you for allowing us to comment on the above planning proposal, please find our representation for the above application to London Borough of Haringey Section 1 - Introduction: With reference to the above application, we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the maincomments we have in relation to Crime Prevention (Appendices 1). At this stage we have met with the original project Architects and the Project Manager for the local authority to discussCrime Prevention and Secured by Design at pre-application stage to discuss our concerns regarding the design and layout of the development. Crime prevention and Secured by Design are mentioned in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early stages and follows the guidance provided in the Design and Access Statement. At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. Section 2 - Secured by Design Conditions and Informative: In light of the information provided, we request the following Conditions and Informative: Conditions: A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve ‘Secured by Design' Accreditation. Accreditation must be achievable	Support noted and conditions attached.

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	according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. Reason: In the interest of creating safer, sustainable communities. Informative: The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813. Section 3 - Conclusion: We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind. Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.	

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METROPOLITAN POLICE

MORE TRUST | LESS CRIME | HIGH STANDARDS

Appendix 1: Concerns and Comments

In summary we have overall site specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal.

It has been noted that there have been several meetings with minutes and recommendations documented by the architects which facilitate early pre-application advice given by our department. Should this advice be taken, then SBD accreditation will be achieved.

Site specific advice may change depending on further information provided or site limitations as the project develops:

This list is not exhaustive and acts as concerns raised during consultation with the architects pre-application.

Note - That the pre-application phase concentrated on the design of the layout of the development, the following also provides the material aspect of the physical target hardening requirements to achieve Secured by Design accreditation and this has not been discussed in detail with the architects or developers.

Site specific advice may change depending on further information or site limitations as the project develops:

A- Boundary Treatment	
Height	Rear courtyard boundary will be 1.8 metres in height and visually permeable. Any vertical transom (support) should be inward facing. Rear terrace boundary (into the courtyard) will be 1.5 metres in height
Party Boundary	Fencing between rear gardens should be at least 1800mm high and designed to avoid climbing aids. Any vertical transom (support) should be inward facing.
Fencing Material Metal	Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing.
Railing Fencing	All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing.
Railing Fencing	Any perimeter boundary treatment (railings) should be between 1. 5m for the terraces and 1.8m for the courtyard perimeter - ideally designed to provide visual permeability.
Gating	Designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a self-closer and the same height as the perimeter treatment including any trellising.
Recess	Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm.
Anti- Climb	If anti-climbing measures are introduced then signage should be used to comply with Occupiers Liability Act 1984.
Fencing Type	Any boundary treatments should be UKAS certified as recommended by a DOCO

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Low Height boundaries	All low defensive wall/railings to be designed to deter sitting, loitering and climbing.

Access Control	
Access Control	**Main external entrances** - Access control at the street side communal entrance is required to maintain security in communal areas and must have audio/visual capability. **Rear communal garden entrance** – Access control is for residents and fob access only **Cycle and Refuse** – Access control is for residents and fob access only **Gates into courtyard –** These are required to be fob access only for residents from dusk till dawn and are on a self-timer to be unlocked during the day
Access Panel	Access control panels (anti-vandal) should achieve the Secured by Design required standard – UL293.
Trades Button	**No** Trades Button on control panel
Audio/Visual Entry (Camera)	DDA (Part M) compliant camera alone is insufficient for first entry door. Primary camera location on access control panel to be considered to capture all visitors. Secondary camera will be required to the side/height that provides the resident a clear image of the visitor.
Data Retention Fob Access	Data retention of access control activations should be utilised throughout the site with the facility to store data for one calendar month before over writing. This data should be available to Police within 24 hours for evidential purposes should it be required. *Consideration to be given to appropriate and sufficient hard drive storage*
Integrated (Part B/ ADQ) Compliance	Access control systems should be Integrated to utilise both fire and security systems.
Emergency Release (Push To Exit)	**Break Glasses** are **not** accepted under the scheme. All break glasses to be replaced with a self-resetting button that satisfies secured by design and building control requirements. **Please seek DOCO advise for products**
Plant Room/ Service Rooms	All service/plant door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or Equivalent certification * Service/plant door/s should be self-closing, self-locking single doors*
Pedestrian Gates	Access controlled external pedestrian gates that provide entry to the development should be accredited to LPS1175 SR2 or equivalent and include Magnetic locks - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom. Designed level to the front building line, be anti-climb and fitted with a dampened stop.
Internet Of Things (IoT)	Due consideration to be given to the security/risk management to access control systems dependent upon how they interact with IoT.

Fire Access - Gates	
DropKey Protection Box(DPB)	If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made.

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	The project fire consultant should be made aware of any Part B Security v's Safety conflicts https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpb).aspx

Doors	
Recessed Areas	Any recesses should not exceed 600mm, but consideration can be given to the Disability Discrimination Act (DDA) requirements. Be advised further by borough occupational therapist.
Communal doors	All external communal/cycle/refuse/service/plant door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCO: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or Equivalent certification * communal/cycle/refuse/service/plant doors should be self-closing, self-locking single doors*
Accessible Doors Apartment and Townhouses	All accessible Residential Doors are required to be the following UKAS certified minimum standard: PAS24:2022 This includes sliding and bi-fold door sets not designated as the primary access/egress routes.
Street Opening Front Doors	Flat/Duplex/House front doors to meet a minimum standard of PAS24:2022 and ideally have a split spindle handle mechanism (requires key to gain access from outside of property) with internal thumb turn.
Residential Door Fittings	The security door viewer should be integral to the product specification. Awareness to DDA requirements for height and number of door viewers.
	The door chain or opening limiter should be affixed to the door set framing not cosmetic architrave.
	Any mail delivery letter plate with-in a PAS24:2022 door set should be compliant to TS008 and where possible incorporate an anti-fish cowl.
Locks	All locks are to be part of the accredited PAS24:2022 specification.

Postal Strategy	
External Secure Mailboxes	Secure mailboxes to serve each property should preferably be fixed to the external face of the building. External post boxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification.

Windows

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Accessible Windows & Roof Lights	All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either: *PAS24:2016 with BS EN356:2000 min. P2A glazing (consider P3A) *STS204 Issue 6:2016, *STS202 Issue 7:2016 Burglary Rating 1 *LPS1175 Issue 7.2:2014 Security Rating 1 or *LPS1175 Issue 8:2018 A1 Security Rating 1 or *LPS 2081 Issue 1.1:2016 Security Rating A. Accessible windows include any glass reached by climbing any number of floors via rainwater pipes, balconies or via communal walkways (whether walkway accessed through secure door or not)
Glazed Apertures	All glazing in and adjacent to: *Residential, communal, front, back doors and ground floor windows *Communal windows that are easily accessible above ground floor level Should incorporate security glazing to the equal standard of the agreed door specification.
Lockable Window Handles	Any window within 2m of an accessible surface should have key operated locks. Where windows form an escape route, Part B (Fire) compliance should be adhered to. All ground floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access.
Access control	
Access Control Layers	**Communal door** – Audio visual for visitors and fob for residents only **Pedestrian Gate** – Fob access for residents **Rear communal door** – fob access for residents **Refuse and cycle store door** – fob access for residents **Internal communal door (creating lobby)** – fob access only **Internal stair core doors** – Audio access for visitors and fob control for residents
CCTV	CCTV can be used to support access control measures where access is gained into communal areas such as the rear garden and the front area

	Cycle Stores
Cycle Storage Lighting	Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected.
Signage	No signage to be erected externally which would provide opportunity for offenders to identify cycle storage.
Bicycle Registry Management	Access to the cycle store should be prohibited. Only residents or users that register (name, address etc.) that information should be given access to the storage facility.
CCTV	CCTV must be installed in cycle stores in public areas. Should have unhindered views of the racking at all times and should be vandal resistant.
Locking Points	There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
Viewing Panel	Cycle store doors should allow light spill from with-in, either a small, obscured viewing panel

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	or robust louvre (as part of the door set).
Internal Signage	Ideally signage should be placed inside the store to reinforce importance of securing cycles by residents.

Balconies / Terraces & Door Canopies	
Balconies	Enclosures to balconies at all levels should be designed to exclude handholds and to eliminate the opportunity for climbing up, down or across between balconies. If a free standing/bolt on balcony system is to be used, consideration must be given to the risk posed by climbing. To prevent this the design should incorporating physical obstructions to frustrate the climber.
Raised Planters	Raised planters should be designed to avoid space beneath to store items such as drugs or weapons and so they do not provide climbing aids to vulnerable areas or balconies
Door Canopies	Where possible, door canopies should be free standing and offer no means of climbing. They also should be of lightweight construction that would not support a person if climbed. If canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A.

Lighting	
Public Realm lighting	Whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard.
Declaration of Conformity	Should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance.
Internal lighting	Communal elements of any scheme ideally should be a controlled by a photo electric sensor. This to always ensure suitable levels of lighting. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected)
Lux levels	Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below: • Office interior (security) 05 Lux • Private car parks 10 Lux • Exterior Rural location 10 Lux • Exterior Urban location 20 Lux • Walkways 30 Lux • Loading bays 50 Lux Further guidance is available in the "Lighting against crime" manual.
Uniformity (Uo)	The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following: • Values of between 0.25 and 0.40 • Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index. • Good lighting will use energy efficient lamps in suitable luminaries.

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Dusk-Till-Dawn Lighting	Lighting, where possible should consist of white light which is evenly distributed In Communal areas: • All entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically. On Residential units: • All residential entrances (front, back, side doors) should also have dusk till dawn lighting, via a photo electric cell with a manual override. Allowing residents/the user local control.
Bollard lighting	**Bollard lighting is not permitted** due to its history of vandalism and ease of been covered over. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination.
Directional lighting	Can be used to support pedestrian routes. Should robust and vandal resistant and be part of an overall lighting strategy (as shown above) Directional lighting should not be a standalone solution to illumination.

Gates	
Gate/s	Ideally gated full height or with infill panels above. Access control and gate/s to be as close to the forward building line as possible. There should be minimal gap beneath the gate. Designed to deter or prevent climbing. House and Duplex gates to include Self closer on the entrance leading to the street door Any gate design to be submitted and approved by DOCO
Ironmongery	All gates should be fitted using anti tamper proof hinges. All hinges and brackets must be fitted in such a way so as not to create a climbing aid.
Push to Exit	Egress button to be minimum of 1.5 metres away from gate and fully shrouded. Any associated cabling to be out of sight.
Pedestrian Gate/s	Designed to deter or prevent climbing. All pedestrian gates to have a minimum of 2 x 500kg resistance magnetic locks. Ideally positioned 1/3 from top and 1/3 from bottom. To be single leaf, self-closing and self-locking.

Climbing Points	
Rain Water Pipes	External rain water pipes should be square/rectangular, flush to the wall or recessed – if round they should be shrouded up to 3m minimum from ground level and have close/flush fitting brackets.
Balcony to Balcony vulnerabilities	Consideration should also be given for opportunities to climb balcony to balcony both up and across Balustrade should be secured to the floor of the balcony and flush to the front removing any vulnerable grip points.

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Balconies and adjacent features	Consider vulnerability of balconies by boundary walls along with • Trees. • Door canopies. • Street furniture. • Neighbouring properties. • ACB and utility meters. • Any outbuildings such as cycle and refuse store. • Vehicles in parking areas.

Utility Meters	
Utility Meters	All utility meters should be positioned where possible in external risers or cupboards removing the requirement for an official to enter the building to read them. Smart meters should be the default requirement for all developments.
Management Plan	If utility meter is to be located within residential unit representatives must have a scheduled appointment made with the concierge or Management Company to gain access to the building.

Car Parking	
Location	Positioned as close as possible to buildings and overlooked by active windows. Should not be located close to boundary walls allowing vehicles to be used to climb into properties.
Lighting	Should be well lit to the latest standard of BS5489 (consider Park Mark guidance) https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf

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Alarm / C.C.T.V	
Alarm Consideration	If an alarm is to be installed it should meet BS EN 50131 (as minimum) which can include wireless systems. If an alarm is not fitted installers should provide a labelled 13amp fused spur on consumer unit for future use. https://www.policesecuritysystems.com/
CCTV Installation	Please note where a development requires CCTV, this facility is to compliment other security measures, not to replace them. As minimum police recommend coverage of the following areas: • Entrance & exit points including secondary coverage of call points, • Foyer / Lobby areas, • Post boxes and Postal rooms, • Cycle stores, • Refuse stores, • Underground or covered parking areas, • Top of stair cores Due consideration to be given to other areas suitable for CCTV throughout the development as part of a site-specific risk assessment. Homes 2019 (55.3.7) requests the system conforms to BS EN 62676: 2014 - video surveillance systems - and where applicable BS7958: 2015 CCTV management and operation codes of practice (COP) as outlined by the requirements of the Information Commissioner's Office.
Quality	Should be of good facial recognition and colour HD quality in both daylight and night vision.
Housing & Signage	CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development.
Storage & Access	• Footage should be preserved for a minimum of 31 days. • Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office. • To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2016 door or SR1 lockable steel cabinet. • Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes.

Party Walling	
Communal to Apartment Walling Preferred System	Light weight framed walls either side of a secure door set (including 600mm around the whole door set) and partitioned walls between two dwellings or communal space shall meet the requirements below: • LPS1175 (Issue 7.2) SR1 • LPS1175 (Issue 8) SR1/A1 • STS202 Issue 7 BR1
Apartment to Apartment Party Walling Alternative	All avenues must be explored to meet the standards above, however the following are potential alternatives if the above cannot be achieved. To be agreed by DOCO. • E-WT-2 Timber Wall • E-WS-3 Light Steel Wall • E-WM-20 Masonry Wall Installation of 9mm (min) timber sheathing or expanding metal in the areas concerned. Wherever possible C-Studs should have 300mm staggered centres.

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Public Realm & Landscaping	
Permeability	• Routes for pedestrians, cyclists and vehicles must be open, direct and not unnecessarily separated from one another. • Footpaths should not run to the rear of, and or provide access to gardens, rear yards or dwellings. If this is the case further mitigation will need to be discussed with the DOCO.
Communal Areas	Communal areas such as playgrounds, seating or amenity areas should be designed to allow natural surveillance from nearby dwellings with safe routes for users to come and go.
Playground Areas	Due consideration to be given to child safeguarding including preventing dogs entering, abductions and children walking out unnoticed by guardian/s. Playgrounds should be: • Located to allow natural surveillance from nearby dwellings. • Clear signage stating age restrictions for specific areas and equipment (i.e. under 5's). • Ideally be fully enclosed with 1.2m open top railings or planting, to prevent casual users. • Should be a single dedicated entrance/exit point to enable parent/guardian supervision • Dedicated entrance/exit point to be gated with self-closer. • Ideally designed to be secured at night, if so boundary heights to be raised. • Vandal resistant equipment to be installed. • Historically playgrounds located at the rear of dwellings create ASB flashpoints and where possible should be avoided. • Lighting needs to be a consideration. 24/7 lighting implies a suggestion of use out of hours (Site specific)
Landscaping Scheme	A full landscaping scheme plan should be submitted and discussed with the DOCO.
Sight lines	• Bushes and shrubs maximum 1m high. • Trees should a canopy height of 2m minimum and maintained to allow clear sight lines. • Landscaping and trees, should be designed to complement CCTV or lighting plans with long term maturity a consideration.
Defensive Planting	Used to create distance from vulnerable areas such as patios, balconies and windows. The usage of defensive planting can complement perimeter boundaries. Defensive planting recommendations: • Plants with flowers for aesthetics and to deflect harsh appearance. • To be mature planting from installation and reach a maximum height of 1m where sight lines need to be maintained. Depth of planting will be site specific recommendations. • Positioned beneath windows and next to fences to deter potential offenders. • Require regular maintenance to prevent getting overgrown. • May require signage to warn of risk of injury (Occupiers Liability Act).

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Appendix 2: Planning Policy

London Plan 2021
Policy D11: Safety, Security and Resilience to Emergency
This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.

Section B of policy D11
Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.

Section C of policy D11
These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be **resilient** to all of these threats.

Paragraph 3.11.3
Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police…. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

Paragraph 3.11.4
The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Paragraph 3.12.10
Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.

DMM4 (Policy DM2) Part A(d) "Have *regard to the principles set out in 'Secured by Design'*"

DMM5: Para 2.14 - "Proposals will be assessed against the principles of secured by design'. The latest published guidance in this respect should be referred."

An Independent Sustainability report by AECOM on Tottenham area action plan states: *"Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale".*

12.3 of same report states:

- Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduces levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.
- There are no references to crime in the **overarching policies**, although it is recognised that housing and economic polices aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.

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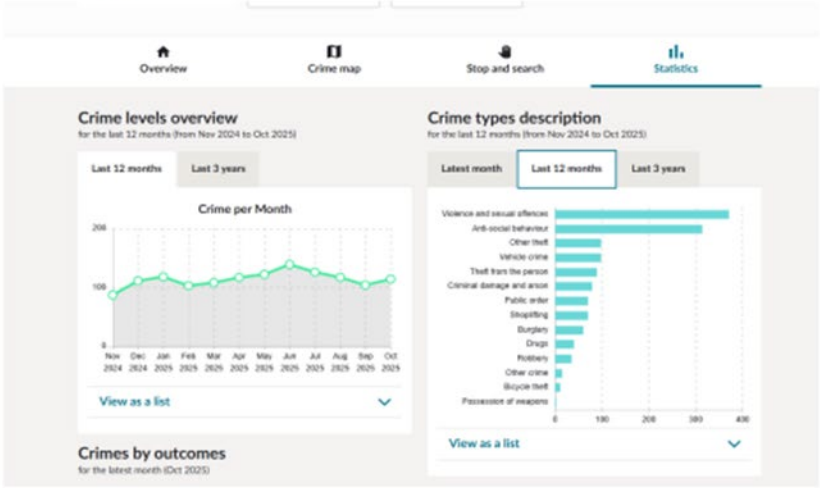
- There are no references to crime in the **neighbourhood area sections;** however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest.

Appendix 3 : Crime Figures

The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.

Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.

The following figures relate to recorded crime data from Police.uk for the below area:



Whilst we cannot provide information down to street area the above information does indicate the level of ASB and associated crime that is typical for the ward, which should be a consideration when designing a development to ensure the reduction in fear of crime as well as crime itself.

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to

Appendix 5: Consultation Responses from external agencies

METROPOLITAN POLICE

MORE TRUST | LESS CRIME | HIGH STANDARDS

Anti-Social Behaviour (ASB)

Particular attention must be drawn to the most prevalent type of incident that will be experienced – **Anti-Social Behaviour (ASB)**. This category covers a multitude of types of incident that can range from what appears quite trivial annoyance to serious criminal acts. Often victims are able to shrug off the minor incidents and do not have the time or energy to report every occurrence, however en mass these create a significant problem.

Research by Ward, Thompson and Tseloni (2017) which was quoted in the victim commissioners report on ASB in 2019 stated:

Less than a third of ASB incidents were reported to the three main reporting agencies - *According to the 2015/16 CSEW, approximately 31% of ASB incidents were reported to the police, local authority or housing association/private landlord. Of those reported, most were reported to the police (of all agencies).*

It is therefore reasonable to assume that the statistics regarding ASB misrepresents the true scale of the problem – the actual figure of incidents is likely to be well over **32 incidents** of ASB per month.

Appendix 5: Consultation Responses from external agencies

Thames Water	Re: 2-240 , TIVERTON ROAD, TOTTENHAM, LONDON, Greater London Authority, N15 6RP Waste Comments: Waste Comments:The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email:	

Appendix 5: Consultation Responses from external agencies

	developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes:https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: “A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the	

	provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/help/home-improvements/how-to-connect-to-a-sewer/sewer-connection-design Thames Water would advise that with regard to the FOUL WATER network capacity, we would not have any objection to the above planning application, based on the information provided. Water Comments: Water Comments:Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a	

	minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater. The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact	

	groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. Supplementary Comments: Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all pilling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location	

Appendix 5: Consultation Responses from external agencies

	and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition. Plans of Thames Water apparatus can be obtained through our website at www.thameswater-propertysearches.co.uk. Please use the following reference in all future correspondence: DTS 80126	
Transport for London Infrastructure Protection	Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, we request that the grant of planning permission be subject to conditions to secure the following: The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with TfL Infrastructure Protection) have been submitted to and approved in writing by the local planning authority which: a) Demonstrate that access to the ventilation shaft will not be obstructed during the full lifecycle of the development. Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.	Support noted and condition attached.

Appendix 5: Consultation Responses from external agencies

	This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.	